

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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BARBARA HILL,

Plaintiff,

-against-

THE DEPARTMENT OF EDUCATION OF THE CITY  
OF NEW YORK

Defendant.

**DECLARATION OF  
ASSISTANT CORPORATION  
COUNSEL SHIVANI R.  
DAMERA IN SUPPORT OF  
DEFENDANT’S OPPOSITION  
TO PLAINTIFF’S MOTION TO  
AMEND THE COMPLAINT**

24-cv-3506-RPK-LB

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**Shivani R. Damera** declares, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendant, New York City Department of Education (“DOE”), in the above-captioned action.

2. I respectfully submit this declaration in support of Defendant’s opposition to Plaintiff’s motion to amend the complaint

3. Annexed hereto are true and correct copies of the following documents submitted in support of Defendant’s motion:

4. Exhibit A is the March 20, 2025 Telephonic Conference Transcript.

**WHEREFORE,** Defendant respectfully requests that the Court deny Plaintiff leave to amend the Complaint as futile, along with any such other and further relief that the Court deems just and proper.

Dated: New York, New York  
May 13, 2025

/s/ Shivani Damera  
Shivani R. Damera  
Assistant Corporation Counsel